

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**AN INQUIRY INTO THE STATE UNIVERSAL ) CASE NO.**  
**SERVICE FUND ) 2016-00059**

**RESPONSE OF BOOMERANG WIRELESS LLC**  
**TO THE COMMISSION'S ORDER OF MAY 11, 2020**

Boomerang Wireless LLC submits its Response to the Commission's Order of May 11, 2020.

Dated: May 22, 2020

Respectfully submitted,

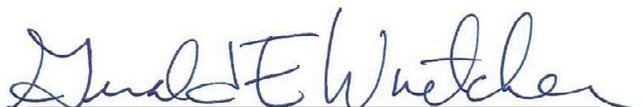


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**CERTIFICATE OF SERVICE**

In accordance with 807 KAR 5:001, Section 8, I certify that Boomerang Wireless LLC's electronic filing of this Response is a true and accurate copy of the same document being filed in paper medium; that the electronic filing was transmitted to the Public Service Commission on May 22, 2020; that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding; and that within 30 days following the end of the state of emergency announced in Executive Order 2020-215 this Response in paper medium will be delivered to the Public Service Commission.



*Counsel for Boomerang Wireless LLC*

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**ELECTRONIC INVESTIGATION INTO                    )**  
**EXCESSIVE WATER LOSS BY KENTUCKY'S        ) CASE NO. 2019-00041**  
**JURISDICTIONAL WATER UTILITIES            )**

**RESPONSE OF**  
**BOOMERANG WIRELESS LLC**  
**TO**  
**THE COMMISSION'S ORDER OF MAY 11, 2020**

**FILED: May 22, 2020**

**BOOMERANG WIRELESS LLC**

**Response to Commission's Order of May 11, 2020  
Case No. 2016-00059**

Question No. 1

Responding Witness: Julia Redman-Carter

- Q-1. State whether the ETC has experienced an increase over the past 45 days in usage of voice minutes and date for Lifeline customers in Kentucky. If so, provide the increase over the monthly usage average.**
- A-1. Boomerang Wireless LLC experienced a 30 percent increase in the monthly average voice usage between January and April 2020.

**BOOMERANG WIRELESS LLC**

**Response to Commission's Order of May 11, 2020  
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Question No. 2

Responding Witness: Julia Redman-Carter

**Q-2. For January and February 2020, provide the percentage of Lifeline customers that exceeded the monthly 1,000 voice minutes or 3 GB of data. Provide the same information for March and April 2020.**

A-2. See chart below.

<b>Month</b>	<b>Lifeline Subscribers above 1000 MOU</b>	<b>Lifeline Subscribers above 3 GB data</b>
January-2020	7.77%	0.40%
February-2020	1.83%	0.10%
March-2020	7.22%	0.62%
April-2020	8.40%	1.56%

**BOOMERANG WIRELESS LLC**

**Response to Commission's Order of May 11, 2020  
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Question No. 3

Responding Witness: Julia Redman-Carter

- Q-3. State whether the ETC is providing additional minutes and data in response to the current state of emergency. If the ETC is providing the additional services, state when the ETC is planning to cease providing the additional services.**
- A-3. Boomerang Lifeline subscribers are receiving an additional 10 GB of data in total for the months of April-2020 and May-2020. The extra 10 GB of data will cease on May 31, 2020.

**BOOMERANG WIRELESS LLC**

**Response to Commission's Order of May 11, 2020  
Case No. 2016-00059**

Question No. 4

Responding Witness: Julia Redman-Carter

- Q-4. State whether the ETC would be willing to provide unlimited voice in Kentucky if additional reimbursement from the KUSF was made available to the ETC for providing unlimited voice.**
- A-4. Boomerang Wireless LLC is willing to provide unlimited voice service if additional reimbursement from the Kentucky Universal Service Fund is made available. Any increase in the reimbursement rates should take into consideration the reductions in federal USF support payments for the minimum voice standard due to the Federal Communications Commission's 2016 *Lifeline Modernization Order* and 47 C.F.R. §54.403

**BOOMERANG WIRELESS LLC**

**Response to Commission's Order of May 11, 2020  
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Question No. 5

Responding Witness: Julia Redman-Carter

**Q-5. State whether the ETC would be willing to provide additional data in Kentucky if additional reimbursement from the KUSF was made available to the ETC for providing additional data. If so, state the amount of additional data the ETC could provide and the cost to provide the data.**

A-5.



**BOOMERANG WIRELESS LLC**

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Question No. 6

Responding Witness: Julia Redman-Carter

**Q-6. If the ETC provided unlimited voice or increased data, state how soon the ETC could implement the increase in services.**

A-6. It may be possible to implement a short-term measure within 15 to 30 days.

**BOOMERANG WIRELESS LLC**

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Question No. 7

Responding Witness: Julia Redman-Carter

**Q-7. State whether there is a minimum time the additional temporary KUSF support and Lifeline services should continue to provide a tangible public health benefit.**

A-7. One year. This minimum period ensures a tangible public health benefit from the proposed action, as well as taking into consideration economic and business practicalities.

**BOOMERANG WIRELESS LLC**

**Response to Commission's Order of May 11, 2020  
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Question No. 8

Responding Witness: Julia Redman-Carter

**Q-8. Provide any information regarding this inquiry that will assist the Commission in its inquiry including its experience from other jurisdictions.**

A-8. Boomerang Wireless LLC is aware that California is currently seriously considering increasing support amounts to enable additional service levels for low income consumers.